

**UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

KATHERINE KLIMEK,	:	Case No.
Plaintiff,	:	
v.	:	
SYNCHRONY BANK,	:	
Defendant.	:	

DEFENDANT SYNCHRONY BANK'S NOTICE OF REMOVAL

**TO: THE HONORABLE UNITED STATES DISTRICT COURT FOR THE MIDDLE
DISTRICT OF PENNSYLVANIA**

PLEASE TAKE NOTICE THAT on this date, Defendant Synchrony Bank, ("Synchrony"), hereby removes the above-captioned matter to this Honorable Court from the Court of Common Pleas of Lackawanna County, and in support thereof would respectfully show as follows:

1. Synchrony is a defendant in a civil action originally filed on or about April 10, 2018, in the Court of Common Pleas of Lackawanna County, titled *Katherine Klimek v. Synchrony Bank and Synchrony Services, LLC*, and docketed to Case No. 2018-CV-2188.
2. Synchrony first received a copy of Plaintiff's Complaint by service on or about April 16, 2018; therefore, this removal is timely under 28 U.S.C. § 1446(b).
3. Pursuant to 28 U.S.C. § 1446, attached hereto as Exhibit A are true and correct copies of all process, pleadings and orders received by Synchrony in the state court action.
4. Removal is based upon federal question jurisdiction. Plaintiff has alleged claims against Synchrony under the Telephone Consumer Protection Act, 47 U.S.C. § 227, a federal statute.

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5. The United States District Court for the Middle District of Pennsylvania has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, and this action is removable to this Court pursuant to 28 U.S.C. § 1441. Accordingly, Synchrony hereby removes this action to the United States District Court for the Middle District of Pennsylvania pursuant to 28 U.S.C. § 1446.

6. Promptly after the filing of this Notice, Synchrony will provide notice of this removal to all parties and to the Court of Common Pleas of Lackawanna County, Pennsylvania.

WHEREFORE, PREMISES CONSIDERED, Defendant Synchrony Bank removes this case to the United States District Court for the Middle District of Pennsylvania.

Respectfully submitted,

May 15, 2018

REED SMITH LLP

By: /s/ Jack P. Bock, III

Jack P. Bock, III (PA # 201758)

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Attorneys for Defendant

Synchrony Bank

CERTIFICATE OF SERVICE

I certify that on May 15, 2018, a true copy of the foregoing document was served on Plaintiff's Counsel below via the Court's ECF system and/or via e-mail:

Brett Freeman, Esq..
Sabatini Law Firm, LLC
216 N. Blakely St.
Dunmore, PA 18512
brett@bankruptcypa.com
Counsel for Plaintiff

I further certify that on May 15, 2018, a true copy of the foregoing document was served on the persons below via U.S. Mail, postage pre-paid:

Prothonotary – Civil Division
Lackawanna County
Court of Common Pleas
Brooks Building
436 Spruce Street
Scranton, PA 18503

REED SMITH LLP

By: /s/ Jack P. Bock, III
Jack P. Bock, III (PA # 201758)